

# EXHIBIT 3

1 CHRISTOPHER HARRIS - CONFIDENTIAL  
2 UNITED STATES BANKRUPTCY COURT  
3 SOUTHERN DISTRICT OF NEW YORK

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In re:,  
LEHMAN BROTHERS HOLDINGS,  
INC., et al.,  
Debtors.

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DEPOSITION OF CHRISTOPHER HARRIS  
Taken on behalf of the Debtor

DATE: January 3rd, 2014

TIME: 1:00 p.m. - 2:43 p.m.

PLACE: Stevens and Lee  
11 North Sixth Street  
Reading, Pennsylvania

Examination of the witness taken before  
Diana L. Netherton  
Registered Professional Reporter  
Pennsylvania Court Reporter's Association  
MBIVR, United Kingdom

1           A.       Yes. That reflects the spot curves  
2       that we would have used to discount the cash flows.

3           Q.       And then the next column over it says,  
4       spread the LIBOR curve.

5           Do you see that?

6           A.       Yes.

7           Q.       And what's that?

8           A.       That is the -- what we refer to as the  
9       residual spread that gets added to the LIBOR spot rate.

10          Q.       Why is it ten basis points?

11          A.       Ten basis points is reflective of where  
12       we have historically seen these sorts of agreements  
13       terminate, and it's effectively reflective of what we  
14       refer to as the mid-market level for the agreement.

15          Q.       In the prior valuations that we've  
16       looked at or generally discussed, would you have  
17       prepared a spreadsheet like this for each one of those  
18       valuation dates?

19          A.       Typically the way that we perform the  
20       valuation is we utilize one set of cash flows. You  
21       chart out the cash flows, and then you update the curve  
22       for each valuation date that you're going to use. So  
23       the other valuations wouldn't have been in a separate  
24       file, per se, but would have used different information  
25       in the LIBOR zero percent rates column.

1 COUNTY OF LANCASTER :

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3 COMMONWEALTH OF PENNSYLVANIA :

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5 I, Diana L. Netherton, RPR, MBVIR, Notary

6 Public, Official Court Reporter and Undersigned

7 Commission, do hereby certify that personally appeared

8 before me, Christopher Harris, the witness, being by me

9 first duly sworn or affirmed to testify to the truth,

10 the whole truth and nothing but the truth, in answer to

11 the oral questions propounded to Christopher Harris by

12 the attorneys for the respective parties as set forth in

13 the foregoing deposition.

14 I further certify that before the taking of

15 said deposition, the above witnesses were duly sworn or

16 affirmed, that the questions and answers were taken down

17 stenographically by the said Diana L. Netherton, RPR,

18 MBIVR, Official Court Reporter, Lancaster, PA, approved

19 and agreed to, and afterwards reduced to print by means

20 of computer-aided transcription under the direction of

21 the aforesaid reporter.

22 In testimony whereof, I have hereunto

23 subscribed my hand this 5th day of January, 2014.

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D.L. Netherton, RPR, MBIVR  
Official Court Reporter

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